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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

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17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 v.
20 RAYLON THIJAY RANDLE,
21 Defendant.

22 CASE NO. 1:21-CR-00246-DAD-BAM
23 STIPULATION REGARDING EXCLUDABLE
24 TIME PERIODS UNDER SPEEDY TRIAL ACT;
25 ORDER
26 DATE: June 14, 2023
27 TIME: 1:00 p.m.
28 COURT: Hon. Magistrate Judge Barbara A. McAuliffe

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30 STIPULATION

31 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
32 through defendant's counsel of record, hereby stipulate as follows:

33 1. By previous order, this matter was scheduled for a status conference on June 14, 2023.

34 2. By this stipulation, the parties move to vacate the status conference and set a change of
35 plea hearing before the Honorable Ana de Alba for July 10, 2023 at 10:00 a.m., and to exclude time
36 from calculation under the Speedy Trial Act between June 14, 2023, and July 10, 2023.

37 3. The parties agree and stipulate, and request that the Court find the following:

38 a) Initial discovery was provided to defendant on or about October 18, 2021,
39 consisting of 114 Bates-stamped items including reports of investigation, body worn camera
40 recordings, photographs, certified conviction records and a summary of defendant's criminal
41 history.

b) The government transmitted a plea offer to counsel for defendant on February 15,

c) The parties anticipate that the case will be ready for a change of plea hearing on 10, 2023.

d) Counsel for defendant believes that failure to grant the above-request would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 14, 2023 to July 10, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results from a continuance granted by the Court request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act provide that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

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6 Dated: June 8, 2023

7 PHILLIP A. TALBERT
United States Attorney

8 _____
9 /s/ KIMBERLY A. SANCHEZ
KIMBERLY A. SANCHEZ
10 Assistant United States Attorney

11 Dated: June 8, 2023

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13 /s/ CHRISTINA CORCORAN
CHRISTINA CORCORAN
14 Counsel for Defendant
15 RAYLON THIJAY RANDLE

16 **ORDER**

17 IT IS SO ORDERED that the status conference set for June 14, 2023, is vacated. A change of plea
18 hearing is set for **July 10, 2023, at 10:00 a.m. before District Judge Ana de Alba.** Time is excluded
19 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

20 IT IS SO ORDERED.

21 Dated: June 8, 2023

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/s/ *Barbara A. McAuliffe*

23 UNITED STATES MAGISTRATE JUDGE